

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

SHUANG CHEN, et al.

Defendants.

WEIGUO GUAN, et al.

Relief Defendants.

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No. 19-cv-12127-WGY

**ASSENTED-TO MOTION FOR ENTRY OF PROPOSED FINAL JUDGMENT  
AGAINST DEFENDANT JIALI WANG**

With the assent of Defendant Jiali Wang, Plaintiff Securities and Exchange Commission (the “Commission”) moves that this Court enter the attached proposed Final Judgment as to Defendant Jiali Wang (“Final Judgment”), attached hereto as Exhibit A. The Commission and Wang have agreed to all terms in the Final Judgment. In support of this motion, the Commission has filed a Consent signed by Wang, memorializing his agreement to the terms of the Final Judgment, attached hereto as Exhibit B.

Specifically, Wang consents to a permanent injunction from violations of Sections 9(a)(2) and 10(b) of the Securities Exchange Act of 1934 (“Exchange Act”) [15 U.S.C. §§78i(a)(2), 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. §240.10b-5], and Section 17(a) of the Securities Act of 1933 (“Securities Act”) [15 U.S.C. §77q(a)]. Section 20(b) of the Securities Act and Section 21(d)(1) of the Exchange Act provide that the Commission may seek, and the Court may grant, a permanent injunction against violations of the federal securities laws. See 15 U.S.C. § 77t(b) and 15 U.S.C. § 78u(d)(1).

Wang further consents to liability for disgorgement of \$7,750,000, representing net profits gained as a result of the conduct alleged in the Complaint, which shall be deemed satisfied by the Order of Forfeiture (Money Judgment) entered against Wang in United States v. Jiali Wang, Crim. No. 1:22-cr-10123-WGY, Dkt. 128 (D. Mass.). Section 21(d)(7) of the Exchange Act provides that the Commission may seek, and the Court may order, disgorgement. See 15 U.S.C. § 78u(d)(7).

For the reasons outlined above, the Commission respectfully requests that the Court enter the attached proposed Final Judgment as to Wang.

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION  
By its attorneys,

/s/ Andrew Palid

Andrew Palid (Mass Bar No. 664968)

Enforcement Counsel

Martin F. Healey (Mass Bar No. 227550)

Regional Trial Counsel

Dated: March 23, 2023

**Certificate of Service**

I, Andrew Palid, certify that on March 23, 2023, a true and correct copy of the Assented-To Motion for Entry of Proposed Final Judgment Against Defendant Jiali Wang, Final Judgment as to Defendant Jiali Wang, and Consent of Defendant Jiali Wang was filed through the Court's CM/ECF system and, accordingly, the document will be sent electronically to the registered participants as identified on the Notice of Electronic Filing. In addition, all defendants and relief defendants were served by email either directly, or through counsel, at addresses attributed to them.

Dated: March 23, 2023

//s// Andrew Palid  
Andrew Palid